

UNITED STATES DISTRICT COURT

for the  
Southern District of New York

In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)

Content and Other Information Associated with the  
iCloud Account Associated With  
[REDACTED] aol.com

24 MAG 1352

Case No.

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

the contents of the iCloud Account associated with [REDACTED] aol.com, provided to the FBI by Apple pursuant to a warrant and order issued on December 2, 2022, by the Hon. Stewart D. Aaron, USMJ, SDNY, 22 Mag. 9730 located in the Southern District of New York, there is now concealed (identify the person or describe the property to be seized):

Please see Attached Affidavit and its Attachment A

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☐ contraband, fruits of crime, or other items illegally possessed;  
☐ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section  
18 U.S.C. §§ 371, 666, 1349  
52 U.S.C. § 30121

Offense Description  
theft of federal funds and conspiracy to steal federal funds) wire fraud and attempt  
and conspiracy to commit wire fraud, and campaign contributions by foreign  
nationals and conspiracy to commit the same

The application is based on these facts:

Please see Attached Affidavit

☒ Continued on the attached sheet.

☒ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: 04/17/2025) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

s/ [REDACTED] by the Court with permission  
Applicant's signature

[REDACTED]  
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
(specify reliable electronic means).

Date: 04/03/2024

[Signature]  
Judge's signature

City and state: New York, NY

Hon. Robyn F. Tarnofsky, USMJ, SDNY

Printed name and title

Print

Save As...

Attach

Reset

SDNY\_01\_000006525  
SUBJECT TO PROTECTIVE ORDER.

**24 MAG 1352**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In the Matter of a Warrant for All  
Content and Other Information  
Associated with the iCloud Account  
Associated With  
[REDACTED]@aol.com, USAO  
Reference No. 2021R00778

**TO BE FILED UNDER SEAL**

**AGENT AFFIDAVIT**

**Agent Affidavit in Support of Application for a Search Warrant  
for Stored Electronic Communications**

STATE OF NEW YORK     )  
  ) ss.  
COUNTY OF NEW YORK )

[REDACTED] Special Agent, Federal Bureau of Investigation, being duly sworn, deposes  
and states:

**I. Introduction**

**A. Affiant**

1. I have been a Special Agent with the Federal Bureau of Investigation (“FBI”) since 2019. I am currently assigned to a public corruption squad of the New York Field Office, where, among other things, I investigate crimes involving illegal campaign contributions, theft of federal funds, and bribery. Through my training and experience, I also have become familiar with some of the ways in which individuals use smart phones and electronic communications, including social media, email, and electronic messages, in furtherance of their crimes, and have participated in the execution of search warrants involving electronic evidence.

2. I make this Affidavit in support of an application pursuant to Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search the contents of the iCloud Account associated with [REDACTED]@aol.com, as previously provided by Apple, Inc. (“Apple”) in response to

warrant 22 Mag. 9730 (the “Subject Data”), for the items and information described in Attachment A. This affidavit is based upon my personal knowledge; my review of documents and other evidence; my conversations with other law enforcement personnel; and my training, experience and advice received concerning the use of computers in criminal activity and the forensic analysis of electronically stored information (“ESI”). Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

**B. The Subject Data**

3. The Subject Data was previously provided to the FBI by Apple pursuant to a warrant and order issued on December 2, 2022, by the Honorable Stewart D. Aaron, United States Magistrate Judge for the Southern District of New York (the “First Adams iCloud Warrant”). *See* 22 Mag. 9730.

4. The Subject Data is presently located in the Southern District of New York, where it is maintained by the FBI in materially identical condition to that in which it was received.

**C. The Subject Offenses**

5. As detailed below, there is probable cause to believe that the Subject Data contains evidence, fruits, and instrumentalities of violations of (i) 18 U.S.C. §§ 371 and 666 (theft of federal funds and conspiracy to steal federal funds), (ii) 18 U.S.C. §§ 1343 and 1349 (wire fraud and attempt and conspiracy to commit wire fraud), and (iii) 18 U.S.C. § 371 and 52 U.S.C. § 30121 (campaign contributions by foreign nationals and conspiracy to commit the same) (collectively, the “Subject Offenses”).

## II. Probable Cause

6. Since in or about August 2021, the FBI and the Office of the United States Attorney for the Southern District of New York have been investigating the receipt of so-called “straw” donations by the 2021 and 2025 New York City mayoral campaigns of Eric Adams, including certain straw donations that were funded by and/or made at the direction of foreign government officials and other foreign persons.

7. As part of this investigation, law enforcement obtained various warrants for electronic evidence, including but not limited to a warrant for the iCloud account associated with [REDACTED]@aol.com, issued on February 20, 2024, by the Honorable Sarah L. Cave, United States Magistrate Judge for the Southern District of New York (the “Second Adams iCloud Warrant”). The Second Adams iCloud Warrant and affidavit in support thereof are attached hereto as Exhibit A and incorporated by reference herein. The Second Adams iCloud Warrant encompasses content created, sent, received, accessed, modified or deleted on or after January 1, 2018.

8. Because of the passage of time between issuance of the First and Second Adams iCloud Warrants and the possibility of deletion by the iCloud account user, it is possible that data produced by Apple pursuant to the First Adams iCloud Warrant is no longer available and therefore will not have been produced by Apple pursuant to the Second Adams iCloud Warrant.<sup>1</sup> Accordingly, this application seeks issuance of a warrant nearly identical in scope to the Second Adams iCloud Warrant (except for an expanded date range), but which expressly applies to the data produced by Apple in response to the First Adams iCloud Warrant—i.e., the Subject Data.

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<sup>1</sup> The data provided by Apple pursuant to the Second Adams iCloud Warrant is not yet available to the investigative team.

9. In making its probable cause determination, I respectfully request that the Court rely on the affidavit in support of the Second Adams iCloud Warrant, *see* Ex. A, and, insofar as the requested warrant encompasses content created, sent, received, accessed, modified or deleted on or after January 1, 2015 (as opposed to January 1, 2018), I would add the following:

a. Pursuant to a search warrant, I have reviewed some of the content on an iPhone 8 Plus used by Eric Adams and provided to the FBI by Adams's counsel. This includes an email dated December 29, 2015, from "[REDACTED]@gmail.com" to "[REDACTED]@gmail.com" (saved in the iPhone as "[REDACTED] Turkey"), with the subject line "Eric."<sup>2</sup> As more fully discussed in the affidavit in support of the Second Adams iCloud Warrant, evidence uncovered in this investigation shows that [REDACTED] conspired to commit, and did in fact commit, the Subject Offenses. (*See, e.g.*, Ex. A at ¶¶ 22-23 & n.9).

b. Pursuant to a search warrant, I have reviewed WhatsApp messages between [REDACTED] and [REDACTED] who was a member of Adams's staff involved in the Subject Offenses, as more fully discussed in the affidavit in support of the Second Adams iCloud Warrant, including messages in July 2017 discussing an itinerary for a trip to Turkey by Eric Adams. During that conversation, [REDACTED] indicates that he is booking hotel accommodations for Adams and Adams's travel companions. Based on my review of records from [REDACTED], I am aware that on or about July 19, 2017, Adams flew to Istanbul with [REDACTED] (Adams's adult son) and [REDACTED] (a longtime aide to and fundraiser for Adams and, until recently, a member of his mayoral administration). I further know that on this trip Adams, [REDACTED] travelled from Istanbul to Nice, France, from Nice back to Istanbul, from Istanbul to Beijing, China, from Beijing

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<sup>2</sup> No message content, if there was any, was preserved.

to Istanbul, and then from Istanbul back to New York, all on free business class tickets from

[REDACTED]

### **III.Procedures for Searching the Subject Data**


10. Law enforcement personnel (who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, agency personnel assisting the government in this investigation, and outside technical experts under government control) will review the Subject Data pursuant to the procedures outlined in the Second Adams iCloud Warrant and affidavit in support thereof. (*See* Ex. A ¶¶ 30-31).

### **IV.Conclusion and Ancillary Provisions**

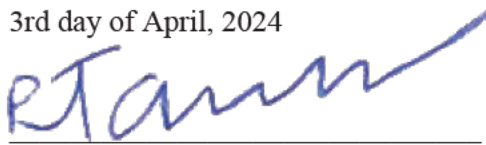
11. Based on the foregoing, I respectfully request the court to issue a warrant to seize the items and information specified in Attachment A to this affidavit and to the Search and Seizure Warrant.

12. I hereby request, pursuant to 18 U.S.C. §§ 3103a(b) and 2705(b), and Federal Rule of Criminal Procedure 41(f)(3), that the Court order that the sealing and non-disclosure provisions detailed in the Second Adams iCloud Warrant and affidavit in support thereof (*See* Ex. A ¶¶ 32-34) continue to apply to the Subject Data.

13. In light of the confidential nature of the continuing investigation, I respectfully request that this affidavit and all papers submitted herewith be maintained under seal until the Court orders otherwise.

 by the Court with permission  
FBI

Sworn to me through the transmission of this  
Affidavit by reliable electronic means, pursuant to  
Federal Rules of Criminal Procedure 41(d)(3) and 4.1, this  
3rd day of April, 2024



Honorable Robyn F. Tarnofsky  
United States Magistrate Judge  
Southern District of New York

## **Attachment A**

### **I. Data Subject to Search and Seizure**

The data that is the subject of this search and seizure warrant (the “Subject Data”) are the contents of the iCloud Account associated with [REDACTED]@aol.com, provided to the FBI by Apple pursuant to a warrant and order issued on December 2, 2022, by the Honorable Stewart D. Aaron, United States Magistrate Judge for the Southern District of New York , 22 Mag. 9730.

### **II. Review of the Subject Data**

Law enforcement personnel (who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, agency personnel assisting the government in this investigation, and outside technical experts under government control) are authorized to review the records produced by the Provider in order to locate any evidence, fruits, and instrumentalities of violations of: (i) 18 U.S.C. §§ 371 and 666 (theft of federal funds and conspiracy to steal federal funds), (ii) 18 U.S.C. §§ 1343 and 1349 (wire fraud and attempt and conspiracy to commit wire fraud), and (iii) 18 U.S.C. § 371 and 52 U.S.C. § 30121 (campaign contributions by foreign nationals and conspiracy to commit the same) (collectively, the “Subject Offenses”), for content created, sent, received, accessed, modified, or deleted on or after January 1, 2015, including the following:

1. Evidence concerning the identity or location of the owner(s) or user(s) of the Subject Account.

2. Evidence of knowledge or understanding of, or intent to violate, laws and regulations governing the conduct of the 2021 New York City Mayoral campaign of Eric Adams (the “2021 Adams Campaign”) on the part of any donor or associate of any donor; the Turkish Government,



including its Consulate General in New York and its employees, officers, or associates; or the 2021 Adams Campaign.

3. Evidence of knowledge or understanding of, or intent to violate, laws and regulations governing the conduct of the 2025 New York City Mayoral campaign of Eric Adams (the “2025 Adams Campaign,” and together with the 2021 Adams Campaign, the “Adams Campaigns”) on the part of any donor or associate of any donor; the Turkish Government, including its Consulate General in New York and its employees, officers, or associates; or the 2025 Adams Campaign.

4. Evidence relating to coordination between Turkish nationals or the Turkish Government and the Adams Campaigns concerning political contributions to the Adams Campaigns, including, but not limited to, evidence of motive and intent for Turkish nationals or the Turkish Government to provide or facilitate campaign contributions to the Adams Campaigns, and evidence of motive and intent by any person who is or was associated with or employed by the Adams Campaigns to provide benefits, whether lawfully or unlawfully, to Turkish nationals or the Turkish Government in return for campaign contributions.

5. Evidence relating to payments to employees, officers, and associates of [REDACTED] to facilitate those employees, officers, and associates making campaign contributions to the Adams Campaigns.

6. Evidence relating to the source of funds for payment or reimbursement of employees, officers, and associates of [REDACTED] for campaign contributions to the Adams Campaigns.

7. Evidence relating to the source of funds for payment or reimbursement of persons serving as conduits for campaign contributions to the Adams Campaigns originating from Turkish national.

8. Evidence of individuals or entities who donated to the Adams Campaigns before or after receiving transfers of funds similar to the amount of the donation.

9. Evidence regarding straw donations to the Adams Campaigns, including without limitation evidence regarding the identities of any persons or entities involved, wittingly or unwittingly, in straw donations, and evidence regarding the sources of funds for straw donations.

10. Evidence of the relationship between and among (i) persons or entities that coordinated or made straw donations or (ii) foreign nationals and/or governments, and any person who is or was associated with or employed by the Adams Campaigns, including all communications with or about, contact information for, and meetings and appointments with co-conspirators.

11. Evidence of an intent to exchange benefits between the Turkish Government or entities and persons acting at its behest, and any person who is or was associated with or employed by the Adams Campaigns, including but not limited to straw donations and any actions taken by any person who is or was associated with or employed by the Adams Campaigns on behalf of the Turkish Government, [REDACTED] or entities and persons acting at the behest of the Turkish Government.

12. Evidence regarding any requests by the Adams Campaigns for matching funds based on straw donations, including any discussions of matching funds.

13. Passwords or other information needed to access the user's online accounts, including encrypted data stored in the Subject Account.

14. Evidence of the geographic location of users, computers, or devices involved in the commission of the Subject Offenses at times relevant to the Subject Offenses.

15. Evidence concerning efforts to conceal communications, meetings, or associations between Turkish nationals, the Turkish Government, [REDACTED] or entities and persons acting at the behest of the Turkish Government, and persons associated with or employed by the Adams Campaigns.

16. Evidence concerning efforts to destroy or conceal evidence of the Subject Offenses or to devise or coordinate false exculpatory explanations for the conduct underlying the Subject Offenses, or to otherwise obstruct law enforcement from investigating the Subject Offenses.

**EXHIBIT A**  
**[24 MAG 736]**

## UNITED STATES DISTRICT COURT

for the

Southern District of New York

In the Matter of the Search of  
 (Briefly describe the property to be searched  
 or identify the person by name and address)

All Content and Other Information Associated with the  
 iCloud Account Associated With  
 [REDACTED]@aol.com

Case No.

24 MAG 1352

## WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search and seizure of the following person or property located in the Southern District of New York  
 (identify the person or describe the property to be searched and give its location):

the contents of the iCloud Account associated with [REDACTED]@aol.com, provided to the FBI by Apple pursuant to a warrant and order issued on December 2, 2022, by the Hon. Stewart D. Aaron, USMJ, SDNY, 22 Mag. 9730

The search and seizure are related to violation(s) of (insert statutory citations):

(i) 18 U.S.C. §§ 371 and 666 (theft of federal funds and conspiracy to steal federal funds), (ii) 18 U.S.C. §§ 1343 and 1349 (wire fraud and attempt and conspiracy to commit wire fraud), and (iii) 18 U.S.C. § 371 and 52 U.S.C. § 30121 (campaign contributions by foreign nationals and conspiracy to commit the same)

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal (identify the person or describe the property to be seized):

See Attachment A

**YOU ARE COMMANDED** to execute this warrant on or before April 17, 2024 (not to exceed 14 days)


☐ in the daytime 6:00 a.m. to 10:00 p.m. ☒ at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to Hon. Robyn F. Tarnofsky  
 (United States Magistrate Judge)

☒ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box)

☐ for \_\_\_\_\_ days (not to exceed 30) ☒ until, the facts justifying, the later specific date of 04/17/2025

Date and time issued: April 3, 2024, 1:23 p.m.


Judge's signature

City and state: New York, NY

Hon. Robyn F. Tarnofsky, USMJ, SDNY

Printed name and title

AO 93C (08/18) Warrant by Telephone or Other Reliable Electronic Means (Page 2)

**Return**

Case No.:

Date and time warrant executed:

Copy of warrant and inventory left with:

Inventory made in the presence of :

Inventory of the property taken and name(s) of any person(s) seized:

**Certification**

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Executing officer's signature*\_\_\_\_\_  
*Printed name and title***Print****Save As...****Reset**

UNITED STATES DISTRICT COURT

for the  
Southern District of New York

In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)

I Content and Other Information Associated with the  
iCloud Account Associated With  
[REDACTED] aol.com

24 MAG 1353  
Case No.

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

the contents of the iCloud Account associated with [REDACTED] aol.com, provided to the FBI by Apple pursuant to a warrant and order issued on February 20, 2024, by the Hon. Sarah L. Cave, USMJ, SDNY, 24 Mag. 736 located in the Southern District of New York, there is now concealed (identify the person or describe the property to be seized):

Please see Attached Affidavit and its Attachment A

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☐ contraband, fruits of crime, or other items illegally possessed;  
☐ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section  
18 U.S.C. §§ 371, 666, 1349  
52 U.S.C. § 30121

Offense Description  
theft of federal funds and conspiracy to steal federal funds)wire fraud and attempt  
and conspiracy to commit wire fraud, and campaign contributions by foreign  
nationals and conspiracy to commit the same

The application is based on these facts:  
Please see Attached Affidavit

- ☒ Continued on the attached sheet.  
☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

s/ [REDACTED] by the Court with permission  
Applicant's signature

[REDACTED]  
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
(specify reliable electronic means).

Date: 04/03/2024

[Signature]  
Judge's signature

City and state: New York, NY

Hon. Robyn F. Tarnofsky, USMJ, SDNY

Printed name and title

Print

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Attach

Reset

SDNY\_01\_000006911  
SUBJECT TO PROTECTIVE ORDER.



**24 MAG 1353**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In the Matter of a Warrant for All  
Content and Other Information  
Associated with the iCloud Account  
Associated With  
[REDACTED] aol.com, USAO  
Reference No. 2021R00778

**TO BE FILED UNDER SEAL**

**AGENT AFFIDAVIT**

**Agent Affidavit in Support of Application for a Search Warrant  
for Stored Electronic Communications**

STATE OF NEW YORK     )  
  ) ss.  
COUNTY OF NEW YORK   )

[REDACTED] Special Agent, Federal Bureau of Investigation, being duly sworn, deposes  
and states:

**I. Introduction**

**A. Affiant**

1. I have been a Special Agent with the Federal Bureau of Investigation (“FBI”) since 2019. I am currently assigned to a public corruption squad of the New York Field Office, where, among other things, I investigate crimes involving illegal campaign contributions, theft of federal funds, and bribery. Through my training and experience, I also have become familiar with some of the ways in which individuals use smart phones and electronic communications, including social media, email, and electronic messages, in furtherance of their crimes, and have participated in the execution of search warrants involving electronic evidence.

2. I make this Affidavit in support of an application pursuant to Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search the contents of the iCloud Account associated with [REDACTED] aol.com, as previously provided by Apple, Inc. (“Apple”) in response to



warrant 24 Mag. 736 (the “Subject Data”), for the items and information described in Attachment A. This affidavit is based upon my personal knowledge; my review of documents and other evidence; my conversations with other law enforcement personnel; and my training, experience and advice received concerning the use of computers in criminal activity and the forensic analysis of electronically stored information (“ESI”). Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

**B. The Subject Data**

3. The Subject Data was previously provided to the FBI by Apple pursuant to a warrant and order issued on February 20, 2024, by the Sarah L. Cave, United States Magistrate Judge for the Southern District of New York (the “February 2024 Adams iCloud Warrant”). *See* 24 Mag. 736.

4. The Subject Data is presently located in the Southern District of New York, where it is maintained by the FBI in materially identical condition to that in which it was received.

**C. The Subject Offenses**

5. As detailed below, there is probable cause to believe that the Subject Data contains evidence, fruits, and instrumentalities of violations of (i) 18 U.S.C. §§ 371 and 666 (theft of federal funds and conspiracy to steal federal funds), (ii) 18 U.S.C. §§ 1343 and 1349 (wire fraud and attempt and conspiracy to commit wire fraud), and (iii) 18 U.S.C. § 371 and 52 U.S.C. § 30121 (campaign contributions by foreign nationals and conspiracy to commit the same) (collectively, the “Subject Offenses”).

## II. Probable Cause

6. Since in or about August 2021, the FBI and the Office of the United States Attorney for the Southern District of New York have been investigating the receipt of so-called “straw” donations by the 2021 and 2025 New York City mayoral campaigns of Eric Adams, including certain straw donations that were funded by and/or made at the direction of foreign government officials and other foreign persons.

7. As part of this investigation, law enforcement obtained various warrants for electronic evidence, including but not limited to the February 2024 Adams iCloud Warrant. The February 2024 Adams iCloud Warrant and affidavit in support thereof are attached hereto as Exhibit A and incorporated by reference herein.

8. The requested warrant is materially identical to the February 2024 Adams iCloud Warrant, except that whereas the February 2024 Adams iCloud Warrant encompassed content created, sent, received, accessed, modified or deleted on or after January 1, 2018, the requested warrant encompasses content created, sent, received, accessed, modified or deleted on or after January 1, 2015. In support of this expanded date range, I would add the following:

a. Pursuant to a search warrant, I have reviewed some of the content on an iPhone 8 Plus used by Eric Adams and provided to the FBI by Adams’s counsel. This includes an email dated December 29, 2015, from [REDACTED]@gmail.com” to [REDACTED]@gmail.com” (saved in the iPhone as “[REDACTED] Turkey”), with the subject line “Eric.”<sup>1</sup> As more fully discussed in the affidavit in support of the February 2024 Adams iCloud Warrant, evidence uncovered in this investigation shows that [REDACTED] conspired to commit, and did in fact commit, the Subject Offenses. (*See, e.g.*, Ex. A at ¶¶ 22-23 & n.9).

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<sup>1</sup> No message content, if there was any, was preserved.

b. Pursuant to a search warrant, I have reviewed WhatsApp messages between [REDACTED] and [REDACTED] who was a member of Adams's staff involved in the Subject Offenses, as more fully discussed in the affidavit in support of the February 2024 Adams iCloud Warrant, including messages in July 2017 discussing an itinerary for a trip to Turkey by Eric Adams. During that conversation, [REDACTED] indicates that he is booking hotel accommodations for Adams and Adams's travel companions. Based on my review of records from [REDACTED] I am aware that on or about July 19, 2017, Adams flew to Istanbul with [REDACTED] (Adams's adult son) and [REDACTED] (a longtime aide to and fundraiser for Adams and, until recently, a member of his mayoral administration). I further know that on this trip Adams, [REDACTED], and [REDACTED] travelled from Istanbul to Nice, France, from Nice back to Istanbul, from Istanbul to Beijing, China, from Beijing to Istanbul, and then from Istanbul back to New York, all on free business class tickets from [REDACTED]

### **III.Procedures for Searching the Subject Data**

9. Law enforcement personnel (who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, agency personnel assisting the government in this investigation, and outside technical experts under government control) will review the Subject Data pursuant to the procedures outlined in the February 2024 Adams iCloud Warrant and affidavit in support thereof. (*See* Ex. A ¶¶ 30-31).

### **IV.Conclusion and Ancillary Provisions**

10. Based on the foregoing, I respectfully request the court to issue a warrant to seize the items and information specified in Attachment A to this affidavit and to the Search and Seizure Warrant.

11. I hereby request, pursuant to 18 U.S.C. §§ 3103a(b) and 2705(b), and Federal Rule of Criminal Procedure 41(f)(3), that the Court order that the sealing and non-disclosure provisions

detailed in the February 2024 Adams iCloud Warrant and affidavit in support thereof (*See* Ex. A ¶¶ 32-34) continue to apply to the Subject Data.

12. In light of the confidential nature of the continuing investigation, I respectfully request that this affidavit and all papers submitted herewith be maintained under seal until the Court orders otherwise.

s/ [REDACTED] by the Court with permission  
SA [REDACTED]  
FBI

Sworn to me through the transmission of this  
Affidavit by reliable electronic means, pursuant to  
Federal Rules of Criminal Procedure 41(d)(3) and 4.1, this  
3rd day of April, 2024



Honorable Robyn F. Tarnofsky  
United States Magistrate Judge  
Southern District of New York

## **Attachment A**

### **I. Data Subject to Search and Seizure**

The data that is the subject of this search and seizure warrant (the “Subject Data”) are the contents of the iCloud Account associated with [REDACTED] aol.com, provided to the FBI by Apple pursuant to a warrant and order issued on February 20, 2024, by the Sarah L. Cave, United States Magistrate Judge for the Southern District of New York , 24 Mag. 736.

### **II. Review of the Subject Data**

Law enforcement personnel (who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, agency personnel assisting the government in this investigation, and outside technical experts under government control) are authorized to review the records produced by the Provider in order to locate any evidence, fruits, and instrumentalities of violations of: (i) 18 U.S.C. §§ 371 and 666 (theft of federal funds and conspiracy to steal federal funds), (ii) 18 U.S.C. §§ 1343 and 1349 (wire fraud and attempt and conspiracy to commit wire fraud), and (iii) 18 U.S.C. § 371 and 52 U.S.C. § 30121 (campaign contributions by foreign nationals and conspiracy to commit the same) (collectively, the “Subject Offenses”), for content created, sent, received, accessed, modified, or deleted on or after January 1, 2015, including the following:

1. Evidence concerning the identity or location of the owner(s) or user(s) of the Subject Account.

2. Evidence of knowledge or understanding of, or intent to violate, laws and regulations governing the conduct of the 2021 New York City Mayoral campaign of Eric Adams (the “2021 Adams Campaign”) on the part of any donor or associate of any donor; the Turkish Government,

including its Consulate General in New York and its employees, officers, or associates; or the 2021 Adams Campaign.

3. Evidence of knowledge or understanding of, or intent to violate, laws and regulations governing the conduct of the 2025 New York City Mayoral campaign of Eric Adams (the “2025 Adams Campaign,” and together with the 2021 Adams Campaign, the “Adams Campaigns”) on the part of any donor or associate of any donor; the Turkish Government, including its Consulate General in New York and its employees, officers, or associates; or the 2025 Adams Campaign.

4. Evidence relating to coordination between Turkish nationals or the Turkish Government and the Adams Campaigns concerning political contributions to the Adams Campaigns, including, but not limited to, evidence of motive and intent for Turkish nationals or the Turkish Government to provide or facilitate campaign contributions to the Adams Campaigns, and evidence of motive and intent by any person who is or was associated with or employed by the Adams Campaigns to provide benefits, whether lawfully or unlawfully, to Turkish nationals or the Turkish Government in return for campaign contributions.

5. Evidence relating to payments to employees, officers, and associates of [REDACTED] to facilitate those employees, officers, and associates making campaign contributions to the Adams Campaigns.

6. Evidence relating to the source of funds for payment or reimbursement of employees, officers, and associates of [REDACTED] for campaign contributions to the Adams Campaigns.

7. Evidence relating to the source of funds for payment or reimbursement of persons serving as conduits for campaign contributions to the Adams Campaigns originating from Turkish national.

8. Evidence of individuals or entities who donated to the Adams Campaigns before or after receiving transfers of funds similar to the amount of the donation.

9. Evidence regarding straw donations to the Adams Campaigns, including without limitation evidence regarding the identities of any persons or entities involved, wittingly or unwittingly, in straw donations, and evidence regarding the sources of funds for straw donations.

10. Evidence of the relationship between and among (i) persons or entities that coordinated or made straw donations or (ii) foreign nationals and/or governments, and any person who is or was associated with or employed by the Adams Campaigns, including all communications with or about, contact information for, and meetings and appointments with co-conspirators.

11. Evidence of an intent to exchange benefits between the Turkish Government or entities and persons acting at its behest, and any person who is or was associated with or employed by the Adams Campaigns, including but not limited to straw donations and any actions taken by any person who is or was associated with or employed by the Adams Campaigns on behalf of the Turkish Government, [REDACTED] or entities and persons acting at the behest of the Turkish Government.

12. Evidence regarding any requests by the Adams Campaigns for matching funds based on straw donations, including any discussions of matching funds.

13. Passwords or other information needed to access the user's online accounts, including encrypted data stored in the Subject Account.

14. Evidence of the geographic location of users, computers, or devices involved in the commission of the Subject Offenses at times relevant to the Subject Offenses.

15. Evidence concerning efforts to conceal communications, meetings, or associations between Turkish nationals, the Turkish Government, [REDACTED] or entities and persons acting at the behest of the Turkish Government, and persons associated with or employed by the Adams Campaigns.

16. Evidence concerning efforts to destroy or conceal evidence of the Subject Offenses or to devise or coordinate false exculpatory explanations for the conduct underlying the Subject Offenses, or to otherwise obstruct law enforcement from investigating the Subject Offenses.



# **EXHIBIT A**

[24 MAG 736]

## UNITED STATES DISTRICT COURT

for the

Southern District of New York

In the Matter of the Search of  
 (Briefly describe the property to be searched  
 or identify the person by name and address)

All Content and Other Information Associated with the  
 iCloud Account Associated With  
 [REDACTED]@aol.com

Case No. **24 MAG 1353****WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS**

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search and seizure of the following person or property located in the Southern District of New York  
 (identify the person or describe the property to be searched and give its location):

the contents of the iCloud Account associated with [REDACTED]@aol.com, provided to the FBI by Apple pursuant to a warrant and order issued on February 20, 2024, by the Hon. Sarah L. Cave, USMJ, SDNY, 24 Mag. 736

The search and seizure are related to violation(s) of (insert statutory citations):

(i) 18 U.S.C. §§ 371 and 666 (theft of federal funds and conspiracy to steal federal funds), (ii) 18 U.S.C. §§ 1343 and 1349 (wire fraud and attempt and conspiracy to commit wire fraud), and (iii) 18 U.S.C. § 371 and 52 U.S.C. § 30121 (campaign contributions by foreign nationals and conspiracy to commit the same)

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal (identify the person or describe the property to be seized):

See Attachment A

**YOU ARE COMMANDED** to execute this warrant on or before April 17, 2024 (not to exceed 14 days)

☐ in the daytime 6:00 a.m. to 10:00 p.m. ☒ at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to Hon. Robyn F. Tarnofsky  
 (United States Magistrate Judge)

☒ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box)

☐ for \_\_\_\_\_ days (not to exceed 30) ☒ until, the facts justifying, the later specific date of 04/17/2025

Date and time issued: April 3, 2024, 1:23 p.m.


Judge's signature

City and state: New York, NYHon. Robyn F. Tarnofsky, USMJ, SDNY

Printed name and title

AO 93C (08/18) Warrant by Telephone or Other Reliable Electronic Means (Page 2)

**Return**

Case No.:

Date and time warrant executed:

Copy of warrant and inventory left with:

Inventory made in the presence of :

Inventory of the property taken and name(s) of any person(s) seized:

**Certification**

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Executing officer's signature*\_\_\_\_\_  
*Printed name and title***Print****Save As...****Reset**